



PROGRESS REPORT NO. 179

TO: Robert Tan, U.S. Environmental Protection Agency (EPA) – via Electronic mail
Bonnie Arthur, EPA – via Electronic mail

FROM: Denise Mills, Teck American Incorporated (TAI)

Cc: Kris McCaig, TAI – via Electronic mail
Rob Orr, TAI – via Electronic mail

DATE: June 9, 2021

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) – Progress Report No. 179 Month Ending May 2021

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technology Evaluation Study (SATES):

TAI submitted the draft Phase II Data Summary Report (DSR) on May 17, 2021. TAI will submit a separate statistical analysis technical memorandum in June that will provide an evaluation of the study results.

The first Phase IV soil sampling event was conducted from May 17 through May 21, 2021. TAI coordinated with CCT to schedule the spring vegetation survey in advance of the soil sampling event. However, CCT was unable to perform the survey in May due to an unexpected change in staff availability, so the first post-application vegetation survey is scheduled to be conducted before the next soil sampling event in July 2021. TAI will continue to coordinate with CCT for this work through the Phase IV monitoring segment of the project.

TAI submitted to EPA Work Plan Change Request No. 3 and No. 4, via email on May 5 and May 14, 2021, respectively, for EPA review and approval. EPA approved Change Request No. 3 and No.4 on May 12 and May 21, 2021.

Baseline Ecological Risk Assessment (BERA) – TAI continued working on the pre-draft terrestrial BERA (the Interim Partial Upland BERA), for submittal to EPA in June 2021. This pre-draft BERA will be revised based on EPA input and incorporated into the draft Site-wide BERA at a later date.

Remedial Investigation (RI) Report – TAI continued working on the pre-draft RI Report focused on the UCR upland areas (the Interim Partial Upland RI), for submittal to EPA in July 2021. This pre-draft RI will be revised based on EPA input and incorporated into the draft Site-wide RI at a later date. On April 7, 2021, TAI provided a flow diagram illustrating the process for the development and review of the draft upland and riverine interim partial RI reports, the corresponding interim partial BERA reports, the Phase 3 Sediment Study data analysis technical memorandum, and the draft Site-wide BERA, as well as the integration of these draft reports and the HHRA (prepared by EPA) into the draft Site-wide RI report.

2019 Phase 3 Sediment Study:

2019 Phase 3 Sediment Study DSR – TAI submitted the draft DSR to EPA for review and comment on December 23, 2020. TAI received comments from EPA on the draft DSR on March 2, 2021. TAI submitted responses to EPA's March 2, 2021 comments and a draft final 2019 Phase 3 Sediment Study DSR to EPA for review and approval on April 1, 2021. As of this writing, TAI received comments on the draft final Phase 3 Sediment Study DSR on June 4, 2021.

Bioassay Testing – In addition to data previously provided by EPA, via the U.S. Geological Survey Columbia Environmental Research Center (CERC), for the Phase 3 bioassay split sample program, CERC provided total recoverable metals data to EPA and TAI on January 8, 2021 and provided total organic carbon data from the bioassay split samples on February 2, 2021. TAI received from EPA on March 31, 2021 a Data Validation Report for chemistry work CERC completed on the bioassay split samples provided to EPA. TAI provided comments to EPA on the Data Validation Report on April 23, 2021. A call was held between EPA and TAI on April 30, 2021 to review and discuss EPA's analysis of the quartz sand control results, as presented in materials provided in advance of the call. As of this writing, an additional call with EPA's team is scheduled for June 16, 2021 for further discussion of the Phase 3 bioassay quartz sand control results.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4515.